

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>ANTHONY DeFRANCO,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Civil Action No. 04-230-ERIE</b>
<b>V.</b>	)	
	)	<b>Judge Maurice B. Cohill, Jr.</b>
<b>SUPERINTENDENT WILLIAM WOLF;</b>	)	<b>Mag. Judge Susan P. Baxter</b>
<b>STEVE REILLY; DENESE BRUNNER;</b>	)	
<b>MANAGER ROD SHOWERS; CASE</b>	)	
<b>MANAGER JUDY JACKSON;</b>	)	
<b>DR. JOHN DOE; JANE DOE;</b>	)	
<b>JEFFREY BEARD; ASSIST. SUPER.</b>	)	
<b>WILLIAM BARR; MARILYN</b>	)	
<b>BROOKS,</b>	)	
<b>Defendants.</b>	)	

**MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S FIRST SET  
OF INTERROGATORIES DIRECTED DEFENDANT BROOKS**

AND NOW, come the defendants, by their attorneys, Thomas W. Corbett, Jr., Attorney General, Mary Lynch Friedline, Senior Deputy Attorney General, and Susan J. Forney, Chief Deputy Attorney General, Chief Litigation Section, and in support of their Motion for Extension of Time to Respond to Plaintiff's First Set of Interrogatories Directed to Defendant Brooks, state the following::

1. Plaintiff has directed two sets of Interrogatories to Defendant Brooks, SCI-Albion Superintendent. Answers to the First Set of Interrogatories are due today, and Answers to the Second Set are due June 1, 2006.

2. Due to scheduling and institutional demands, defendant Brooks is unable to complete her responses to the First Set of Interrogatories by today, and she requests an additional week to submit her Answers to the First Set of Interrogatories.

3. Defendant submits that this extension will not prejudice plaintiff in any way at this stage of the case, particularly given the number of interrogatories already submitted to and answered by Albion personnel.

WHEREFORE, it is respectfully requested that the deadline for Defendant Brooks' Answers to Plaintiff's First Set of Interrogatories be extended an additional week, until June 2, 2006.

Respectfully submitted:

Thomas W. Corbett, Jr.  
Attorney General

By: /s/ Mary Lynch Friedline  
MARY LYNCH FRIEDLINE  
Senior Deputy Attorney General  
Attorney I.D. No. 47046  
Susan J. Forney  
Chief Deputy Attorney General  
Litigation Section

Office of Attorney General  
6th Fl., Manor Complex  
564 Forbes Avenue  
Pittsburgh, PA 15219  
Date: May 26, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that on May 26, 2006, I electronically filed the foregoing ***Motion for Extension of Time to Respond to Plaintiff's First Set of Interrogatories Directed to Defendant Brooks*** with the Clerk of Court using the CM/ECF system. This document will be mailed via U.S. mail to the following non CM/ECF participants:

Anthony DeFranco, CZ-3518  
SCI-Albion  
10745 Route 18  
Albion, PA 16475-0001

By: /s/ Mary Lynch Friedline  
MARY LYNCH FRIEDLINE  
Senior Deputy Attorney General

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564 Forbes Avenue  
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